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Attorney for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case No.: 2:20-cr-244-RFB-NJK
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
BABY VASQUEZ BELTRAN,	)	<b>STIPULATION TO CONTINUE</b>
	)	<b>SENTENCING</b>
Defendant.	)	
_____	)	

Certification: This stipulation is timely filed.

**IT IS HEREBY STIPULATED** by and between , ERIC SCHMALE , Assistant United States Attorney, counsel for Plaintiff, UNITED STATES OF AMERICA, Defendant, BABY VASQUEZ BELTRAN, by and through her counsel DAN M. WINDER, ESQ., of the LAW OFFICE OF DAN M. WINDER, PC, that the Sentencing Hearing currently scheduled for March 4, 2021, be vacated and continued to a date which are convenient to this Honorable Court, not less than thirty (30) days from this date.

This stipulation is entered into for the following reasons:

1. Defendant requires additional time to prepare the Pre-sentencing Report.
2. The parties agree to the continuance sought herein.
3. The Defendant does not object to the continuance in this matter.
4. The additional time requested herein is not sought for purposes of delay.

5. This is the first request for continuance of the Sentencing herein.

DATED this 1<sup>st</sup> day of March, 2021.

NICHOLAS A. TRUTANICH US ATTORNEY

LAW OFFICE OF DAN M. WINDER, PC

/s/ Eric Schmale

ERIC SCHMALE

Assistant United States Attorney

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/s/ Dan M. Winder

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**UNITED STATES DISTRICT COURT  
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UNITED STATES OF AMERICA, )  
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Plaintiff, )  
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vs. )  
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BABY VASQUEZ BELTRAN )  
 )  
Defendant. )

Case No.: 2:20-cr-244-RFB-NJK

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

Certification: This stipulation is timely filed.

**FINDINGS OF FACT**

Based on the Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant requires additional time to prepare the Pre-sentencing Report.
2. The parties agree to the continuance sought herein.
3. The Defendant does not object to the continuance in this matter.
4. The additional time requested herein is not sought for purposes of delay.
5. This is the first request for continuance of the sentencing hearing filed herein.

**CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the Defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the

1 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into  
2 account the exercise of due diligence.

3 **ORDER**

4 **IT IS HEREBY ORDERED** that the sentencing hearing currently scheduled for March 4,  
5 2021. shall be and is hereby vacated and continued to the 15th day of April, 2021  
6 at the hour of 1:00 PM.

7 DATED this 2nd day of March, 2021.

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9 RICHARD F. BOULWARE, II  
10 UNITED STATES DISTRICT JUDGE  
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